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BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

SEP - 3 1996

FEDERAL COMMUNICATIONS
COMMISSION
OFFICE OF SECRETARY

IN THE MATTER OF:) MM DOCKET NO: 96-121
AMENDMENT OF SECTION 73.202(B),) RM-8806
TABLE OF ALLOTMENTS,)
FM BROADCAST STATIONS)
(FORESTVILLE, WISCONSIN)

TO: CHIEF, ALLOCATIONS BRANCH,
POLICY AND RULES DIVISION,
MASS MEDIA BUREAU

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REPLY COMMENTS

Lyle Robert Evans d/b/a The Radio Company
Petitioned the Federal Communications Commission in
Washington, D.C., to amend Table of FM Allotments, Section
73.202(b) of the Commission's Rules and Regulations in the
following manner:

<u>Community:</u>	<u>Existing:</u>	<u>Proposed:</u>
Forestville, WI	None:	Ch. 281A

On June 05, 1996, the Commission released a NOTICE
OF PROPOSED RULE MAKING proposing to allot FM Channel 281A
to Forestville and invited comments on the proposal.

On May 21, 1996, WTRW, Incorporated, petitioned the
Commission to amend 47 Code of Federal Regulations
§73.202(b), Table of FM Allotments, to allot FM Channel 281A
(104.1 MHz.) to the City of Algoma, Wisconsin, as that

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community's second FM broadcast service.

FCC Public Notice Number 64617, dated August 16, 1996, announced the WTRW, Incorporated, Petition For Rulemaking will be treated as a Counterproposal in MM Docket 96-121.

WTRW, Incorporated stated its intention to file an Application For Construction Permit For Commercial Broadcast Station (FCC Form Number 301) to activate FM Channel 281A if allotted at Algoma. It stated it would not file such an application for Channel 281A if allotted at Forestville.

The Radio Company has no desire to file an Application For Construction Permit For Commercial Broadcast Station (FCC Form Number 301) to activate FM Channel 281A if allotted at Algoma.

The Radio Company agrees residents of Algoma, Wisconsin, and vicinity would benefit greatly from a second local aural broadcast service.

Ideally the Commission should provide channels for the expressed interest of WTRW, Incorporated, at Algoma, Wisconsin, and The Radio Company at Forestville, Wisconsin.

The Radio Company by these Reply Comments advances the following allotment proposal.

<u>Community:</u>	<u>Present:</u>	<u>Proposed:</u>
Forestville, WI	None	Ch. 271A
Algoma, WI	Ch. 244C3	Ch. 244C3 Ch. 281A

In support of these REPLY COMMENTS proposing to allot FM Channel 271A to Forestville, Wisconsin, The Radio Company, the Petitioner, respectfully submits the Engineering Statement prepared by Lyle Robert Evans, Technical Consultant, attached hereto as Appendix 1.

Inasmuch as Forestville, Wisconsin, residents shall be provided a first local aural broadcast service and the residents of Algoma shall be provided a second local FM Broadcast service, The Radio Company, the Petitioner, concludes the allotment proposed these Reply Comments in the Public Interest.

The FM Channel 271A allotment petitioned by The Radio Company shall provide residents of Forestville, Wisconsin, and vicinity an outlet for local self expression.

The allotment of FM Channel 271A (102.1 MHz.) to the Village of Forestville, Wisconsin, is full accord with Commission's Rules and Regulations, and Assignment policy.

If the Commission goes forward to Amend 47 Code of Federal Regulations §73.202(b), to allot FM Channel 271A to Forestville, Wisconsin, as Petitioned, The Radio Company shall immediately file an Application For Construction Permit For Commercial Broadcast Station (FCC Form 301), to activate FM Channel 271A, as allotted at Forestville.

Upon Commission "Grant" of such a Form 301 Application, The Radio Company shall promptly construct and

subsequently license the permitted facility.

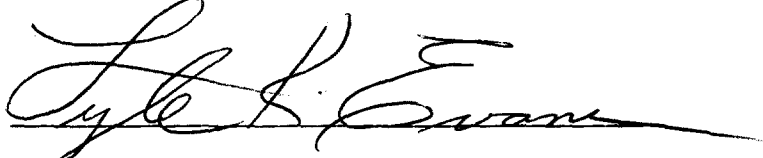
In accord with 47 Code of Federal Regulations
§1.52, I, Lyle Robert Evans d/b/a The Radio Company, hereby
certify I have read this entire document, that to the best
of my knowledge, information and belief it is true and
correct, that there is good ground to support it, and that
it is not interposed for delay.

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Respectfully submitted,

THE RADIO COMPANY

August 30, 1996

A handwritten signature in dark ink, appearing to read "Lyle R. Evans", written over a horizontal line.

Lyle Robert Evans,
Petitioner

Lyle Robert Evans d/b/a
The Radio Company
1296 Marian Lane
Green Bay, Wisconsin 54304
(414) 494-6310

REPLY COMMENTS; CONCLUDED

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

ENGINEERING STATEMENT

IN THE MATTER OF:) MM DOCKET NO: 96-121

AMENDMENT OF SECTION 73.202(B),) RM - 8806
TABLE OF ALLOTMENTS,)
FM BROADCAST STATIONS,)
(FORESTVILLE, WISCONSIN.)

TO: CHIEF, ALLOCATIONS BRANCH,
POLICY AND RULES DIVISION,
MASS MEDIA BUREAU.

PREPARED FOR:

THE RADIO COMPANY

AUGUST 30, 1996

PREPARED BY:

LYLE ROBERT EVANS
TECHNICAL CONSULTANT
PACER TECHNICAL SERVICE, INC.
1750 FREEDOM ROAD
LITTLE CHUTE, WISCONSIN 54140

(414) 687-0722

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

IN THE MATTER OF:) MM DOCKET NO: 96-121
AMENDMENT OF SECTION 73.202(B),) RM-8806
TABLE OF ALLOTMENTS,)
FM BROADCAST STATIONS)
(FORESTVILLE, WISCONSIN)
TO: CHIEF, ALLOCATIONS BRANCH,
POLICY AND RULES DIVISION,
MASS MEDIA BUREAU

ENGINEERING STATEMENT

This Engineering Statement concerns the above captioned Petition For Rule Making, to which this Statement is Appendix 1.

The Radio Company, Petitioner, retained the services of Lyle Robert Evans, Technical Consultant, to conduct engineering studies and prepare necessary Statements and Attachments to support Reply Comments regarding RM-8806 in MM Docket Number: 96-121.

On May 08, 1996, The Radio Company petitioned the Commission to amend 47 Code of Federal Regulations §73.202(b), Table of FM Allotments, to allot FM Channel 281A (104.1 MHz.) to the Village of Forestville, Wisconsin, as that community's first aural broadcast service.

On May 21, 1996, WTRW, Incorporated, petitioned the Commission to amend 47 Code of Federal Regulations

§73.202(b), Table of FM Allotments, to allot FM Channel 281A (104.1 MHz.) to the City of Algoma, Wisconsin, as that community's second FM broadcast service.

FCC Public Notice Number 64617, dated August 16, 1996, announced the WTRW, Incorporated, Petition For Rulemaking will be treated as a Counterproposal in MM Docket 96-121.

To provide channels for the expressed interest of WTRW, Incorporated, at Algoma and The Radio Company at Forestville, The Radio Company by its Reply Comments proposes allotment of Channel 281A to Algoma and Channel 271A to Forestville.

The Village of Forestville, Wisconsin, reference Geographic Coordinates specified in the National Atlas of the United States of America, published by the Department of Interior Geological Survey are: 44°-41'-18" North Latitude, 87°-28'-48" West Longitude.

Attachment E-A to this Engineering Statement, an FM Channel 271A Distance Separation Study with the Village of Forestville reference coordinates as base, sets forth all FM Broadcast Station assignments, applications and allotments, relating to an allotment of FM Channel 271A at Forestville.

This Attachment E-A displays a short-spacing to FM Broadcast Station WQTC-FM, Manitowoc, Wisconsin, licensed

to operate on Channel 272A; FCC File Number: BLH-900523KA.

To allot FM Channel 271A to Forestville, it is necessary to restrict the allotment location 8.52 kilometers (5.29 miles) distant at a bearing of 0.0 degrees True from the village reference to; geographic coordinates: 44°-45'-54" North Latitude, 87°-28'-48" West Longitude.

Attachment E-B to this Engineering Statement, an FM Channel 271A Distance Separation Study with the Forestville Channel 271A specified restricted allotment coordinates as base, dispalys allotment of FM Channel 271A at Forestville in compliance with all applicable minimum distance separation requirements set forth by 47 Code of Federal Regulations §73.207.

The most distant point on the Forestville, Wisconsin, Corporate Boundary from the FM Channel 271A specified restricted allotment coordinates was located on United States Geological Survey 7.5 Minute Series (topographic) Map, titled: Forestville Quadrangle, Wisconsin (dated 1982).

The geographic coordinates of this most distant point determined as: 44°-40'-58" North Latitude, 87°-29'-04" West Longitude, and distance and bearing from the Forestville Channel 271A restricted allotment coordinates calculated at 9.14 kilometers (5.68 miles) at 182.2 degrees True.

The F(50,50) 70.0 dBu (3.16 mV/m) predicted principal community contour of a typical Class A FM Broadcast Station radiating 6,000 Watts from an antenna radiation center HAAT of 100.0 meters extends a distance of 16.5 kilometers (10.25 miles).

Many transmitter sites exist from which the requisite principal community coverage can be provided to the entire Village of Forestville, Wisconsin.

CONCLUSION

Allotment of Channel 271A (102.1 MHz.) to Forestville, Wisconsin, can be accomplished with no channel substitutions. No multiple community "tinkering with the table" is required to allot FM Channel 271A at Forestville.

The Radio Company's proposed Amendment of 47 Code of Federal Regulations §73.202(b), Table of FM Allotments, shall provide residents of Forestville, Wisconsin, and vicinity a first local aural broadcast service and residents of Algoma, Wisconsin, and vicinity a second local aural broadcast service.

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ATTACHMENT E-A

CHANNEL 271A DISTANCE SEPARATION STUDY

LOCATION: FORESTVILLE, WISCONSIN
SERVICE: COMMERCIAL FM
CHANNEL: 271
FREQUENCY: 102.1 MHZ.
ZONE: II
CLASS: A
COORDINATES: 44°-41'-18" N.L., 87°-28'-48" W.L. (VILLAGE REFERENCE COORDINATES)
PETITIONER: THE RADIO COMPANY
DATE: AUGUST 25, 1996

CALL STATUS	CITY STATE	FCC FILE	CHAN. FREQ.	ERP(KW) EAH(MT)	LATITUDE LONGITUDE	BEAR. (DEG.)	DIST. (KM.)	REQ. (KM.)
WGAZ LIC	GOODMAN WI	BLD-930510KA	217A 91.3	0.420 93.00	45-37-36 88-21-28	326.9	125.05 115.05	10.0 CLEA
WGBW LIC	GREEN BAY WI	BLD-930818KB	218A 91.5	0.710 226.00	44-21-32 87-59-07	227.7	54.35 4.359	10.0 CLEA
WJNR-FM LIC	IRON MOUNTAIN MI	BLH-940815KC	268C1 101.5	100.00 187.00	45-49-15 88-02-38	340.9	113.42 38.42	75. CLEA
WMRR LIC	MUSKEGON HEIGHTS MI	BLH-940902KB	269B1 101.7	12.00 145.00	43-16-38 86-20-05	149.3	181.73 131.73	50. CLEA
WLDR LIC	TRAVERSE CITY MI	BLH-920403KB	270C1 101.9	100.00 192.00	44-46-13 85-41-33	85.7	141.68 8.68	133. CLEA
WLUM-FM LIC	MILWAUKEE WI	BLH-900523KA	271B 102.1	20.00 232.00	43-05-48 87-54-19	191.0	180.12 2.12	178. CLEA
WQTC-FM LIC	MANITOWOC WI	BLH-860922KB1	272A 102.3	3.00 100.00	44-07-31 87-37-41	190.7	63.67 -8.33	72. SHOR
WNWC LIC	MADISON WI	BLH-3247	273B 102.5	50.00 137.00	43-02-07 89-30-25	222.2	245.54 176.54	69. CLEA
WRVM LIC	SURING WI	BLH-920702KE	271B 102.7	100.00 299.00	44-59-50 88-23-49	295.7	80.21 5.21	75. CLEA

===== FM CHANNEL 271A DISTANCE SEPARATION STUDY CONCLUDED =====

ATTACHMENT E-B

Page 1 of

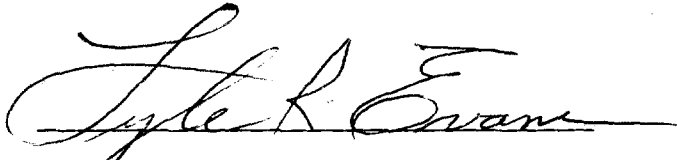
CHANNEL 271A DISTANCE SEPARATION STUDY

LOCATION: FORESTVILLE, WISCONSIN
 SERVICE: COMMERCIAL FM
 CHANNEL: 271
 FREQUENCY: 102.1 MHZ.
 ZONE: II
 CLASS: A
 COORDINATES: 44°-45'-54" N.L., 87°-28'-48" W.L. (ILLUSTRATIVE SITE COORDINATES)
 PETITIONER: THE RADIO COMPANY
 DATE: AUGUST 25, 1996

CALL STATUS	CITY STATE	FCC FILE	CHAN. FREQ.	ERP(KW) EAB(MT)	LATITUDE LONGITUDE	BEAR. (DEG.)	DIST. (KM.)	REQ. (KM.)
WGAZ LIC	GOODMAN WI	BLED-930510KA	217A 91.3	0.420 93.00	45-37-36 88-21-28	324.2	117.97 107.97	10. CLEA
WGBW LIC	GREEN BAY WI	BLED-930818KB	218A 91.5	0.710 226.00	44-21-32 87-59-07	220.5	61.77 51.77	10. CLEA
WJNR-FM LIC	IRON MOUNTAIN MI	BLH-940815KC	268C1 101.5	100.10 187.00	45-49-15 88-12-38	339.4	125.36 50.36	75. CLEA
WMRR LIC	MUSKEGON HEIGHTS MI	BLH-940902KB	269B1 101.7	12.00 145.00	43-16-38 86-20-05	151.0	189.04 139.04	50. CLEA
WLDR LIC	TRAVERSE CITY MI	BLH-920403KB	270C1 101.9	100.00 192.00	44-46-13 85-41-33	89.8	141.41 8.41	133. CLEA
WLUM-FM LIC	MILWAUKEE WI	BLH-900523KA	271B 102.1	20.00 232.00	43-05-48 87-54-19	190.4	188.44 10.44	178. CLEA
WQTC-FM LIC	MANITOWOC WI	BLH-860922KB1	272A 102.3	3.00 100.00	44-07-31 87-37-41	189.4	72.04 .04	72. CLEA
WNWC LIC	MADISON WI	BLH-3247	273B 102.5	50.00 137.00	43-02-17 89-30-25	220.3	251.80 182.80	69. CLEA
WRVM LIC	SURING WI	BLH-920702KE	271B 102.7	100.00 299.00	44-59-50 88-23-49	289.6	76.85 1.85	75. CLEA

===== FM CHANNEL 271A DISTANCE SEPARATION STUDY CONCLUDED =====

Respectfully submitted,

A handwritten signature in cursive script, reading "Lyle R. Evans". The signature is written in dark ink and is positioned above the typed name.

Lyle Robert Evans
Technical Consultant to:
The Radio Company

August 30, 1996

Lyle Robert Evans
Technical Consultant
Pacer Technical Service, Inc.
1750 Freedom Road
Little Chute, Wisconsin 54140
(414) 687-0722

ENGINEERING STATEMENT; CONCLUDED

CERTIFICATE OF SERVICE

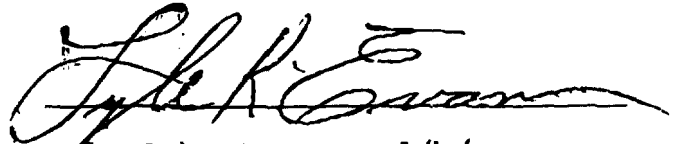
I Lyle Robert Evans, do hereby certify that I have this 3rd of September, 1996, mailed by first-class United States mail postage prepared, copies of the foregoing "REPLY COMMENTS" to the following:

WTRW, Incorporated

Mark Heller

1414 16th Street

Two Rivers, WI 54241-3031

A handwritten signature in black ink, appearing to read "Lyle R. Evans", with a long, sweeping horizontal line extending to the right.

Lyle Robert Evans d/b/a
The Radio Company